

United States District Court

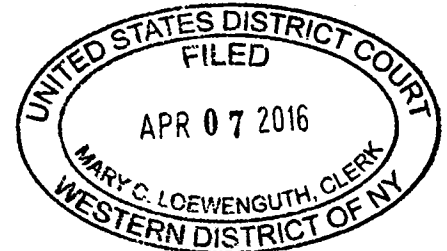
for the
Western District of New York

United States of America

v.

JOSEPH CONRAD GOODE

Case No. 16-M- 53



CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Beginning on or about April 7, 2016, in the Western District of New York, the above named defendant did knowingly and willfully make a threat to take the life of and to inflict bodily harm upon the President of the United States, in violation of Title 18, United States Code, Section 871; to take the life of and to inflict bodily harm upon a former President or a member of the immediate family of a former President, in violation of Title 18, United States Code, Section 879; and to take the life of and to inflict bodily harm upon a major candidate for the Office of the President of the United States, in violation of Title 18, United States Code, Section 879.

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.



Complainant's signature

Eugene King, Special Agent
United States Secret Service

Printed name and title

Sworn to before me and signed in my presence.

Date: April 7, 2016


Judge's signature

City and State: Buffalo, New York

H. KENNETH SCHROEDER, JR.
UNITED STATES MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

I, EUGENE RYAN KING, being duly sworn, state as follows:

1. I am a Special Agent of the United States Secret Service, and have been so employed since June, 2015. I am assigned to the Buffalo Field Office, where my duties include the investigation of threats against protected individuals, including, but not limited to, the President of the United States, former Presidents of the United States, and major candidates for the office of the President or Vice President of the United States, and facilities under the direct protection of the United States Secret Service.

2. As part of my current duties, I am conducting an investigation of suspected violations of Title 18, United States Code, Sections 871 and 879 by **Joseph Conrad Goode** (hereinafter referred to as "**GOODE**"). This affidavit is submitted in support of a criminal complaint charging that **GOODE** did knowingly and willfully make a threat to take the life of and to inflict bodily harm upon the President of the United States, namely Barack Obama, in violation of Title 18, United States Code, Section 871; to take the life of and to inflict bodily harm upon a former President or a member of the immediate family of a former President, namely William Clinton and Hillary Clinton, in violation of Title 18, United States Code, Section 879; and to take the life of and to inflict bodily harm upon a major candidate for the Office of the President of the United States, in violation of Title 18,

United States Code, Section 879, namely candidates Bernie Sanders, Hilary Clinton, Donald Trump, and Ted Cruz.

3. The information contained in this affidavit is based upon information I have gathered during the ongoing criminal investigation, my personal observations, my training and experience and/or information relayed to me by other law enforcement officers and or/agents in involved in this investigation. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation. I have set forth only facts that I believe are necessary to establish probable cause to believe that Title 18, United States Code, Sections 871 and 879, have been violate by GOODE.

PROBABLE CAUSE

4. On April 7, 2016, the United States Secret Service Buffalo Field Office received information from medical personnel at Erie County Medical Center ("ECMC") to the effect that GOODE had threatened to injure and kill Barack Obama, William Clinton, Donald Trump, Hillary Clinton, and Ted Cruz.

5. Your undersigned and other Secret Service personnel were assigned to the investigation and thereafter, went to ECMC to conduct an investigation. Thereafter, your undersigned and another agent conducted interviews of ECMC personnel and obtained

signed statements concerning the facts at issue on April 7, 2016. During the course of the interviews of the ECMC personnel, the following information/statements were provided:

- A. On 04/07/16, **GOODE** stated to ECMC personnel that was going to get a “high powered rifle and kill all the presidential candidates,” and that “is the kind of person ready to snap and shoot up a public place.”
- B. On 04/07/16, **GOODE** was heard by ECMC personnel stating that “Bill Clinton is only a couple hours away and I am going to fucking kill him along with Donald Trump, Ted Cruz and all of the FBI.” **GOODE** also was heard stating that he had a sniper rifle and was going to get it when he got out of here [meaning ECMC].
- C. On 04/07/16, **GOODE** made numerous statements heard by ECMC Comprehensive Psychiatric Emergency Program personnel about wanting to kill Hillary Clinton and Donald Trump.
- D. On 04/07/16, **GOODE** stated and was heard by ECMC personnel that **GOODE** desire to acquire a long range sniper rifle and kill the presidential candidates because he wants to “see the world burn.”
- E. On 04/07/16, **GOODE** was heard by ECMC personnel stating that he was going to kill President Obama and Donald Trump.

F. On 04/07/16, **GOODE** made numerous statements heard by ECMC CPEP personnel that he wanted to acquire a high powered rifle and kill Bill Clinton, Ted Cruz and Donald Trump.

6. Additionally, on April 7, 2016, **GOODE** was interviewed in an interview room at ECMC after Miranda warnings were administered to him by another Secret Service agent in my presence. **GOODE** stated that he understood the Miranda warnings, wished to waive those rights, and to speak with agents. **GOODE** declined to sign a written waiver of Miranda warnings. **GOODE** thereafter stated, among other things, that "everything they said [meaning the ECMC personnel] was true," and as your undersigned and the other Secret Service agent were leaving, **GOODE** stated that "I felt like killing Trump, I felt like killing Clinton, I felt like killing Sanders but I said it out of anger."

7. Barack Obama is the current President of the United States. William Clinton is a former President of the United States and Hillary Clinton is the wife of William Clinton. Bernie Sanders, Hillary Clinton, Donald Trump, and Ted Cruz are major candidates for the Office of the President of the United States in the upcoming Presidential election in November, 2016.

8. As noted in the press coverage concerning the 2016 Presidential campaign, Hillary Clinton and Bernie Sanders are expected to arrive in the Buffalo, New York area, namely within the Western District of New York, on April 08, 2016 and April 11, 2016, respectively. As noted in the press coverage concerning the 2016 Presidential campaign,

Donald Trump is expected to arrive in the Rochester, New York and Albany, New York areas on April 10, 2016 and April 11, 2016, respectively.

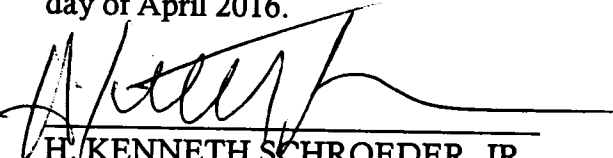
CONCLUSION

9. Based on the foregoing, your affiant respectfully submits that there is probable cause to believe that JOSEPH CONRAD GOODE did knowingly and willfully make a threat to take the life of and to inflict bodily harm upon the President of the United States, namely Barack Obama, in violation of Title 18, United States Code, Section 871; to take the life of and to inflict bodily harm upon a former President or a member of the immediate family of a former President, namely William Clinton and Hilary Clinton, in violation of Title 18, United States Code, Section 879; and to take the life of and to inflict bodily harm upon a major candidate for the Office of the President of the United States, in violation of Title 18, United States Code, Section 879, namely candidates Bernie Sanders, Hillary Clinton, Donald Trump, and Ted Cruz.


Eugene Ryan King
United States Secret Service

Sworn to before me this 7th

day of April 2016.


H. KENNETH SCHROEDER, JR.
United States Magistrate Judge